

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF TEXAS  
DIVISION**

IN RE

MARY BETH AVERA

CASE NO.  
24-33525

CHAPTER  
7

---

**RESPONSE OF BRIDGECREST ACCEPTANCE CORPORATION  
IN PARTIAL OPPOSITION TO DEBTOR'S  
MOTION TO REDEEM  
2017 FORD ESCAPE, VIN XX6135**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Bridge crest Acceptance Corporation, Respondent in the above Motion to Redeem filed by the Debtor, Mary Beth Avera, and would respond to her Motion to Redeem as follows:

1. Respondent is not opposed to redemption of the collateral at the price stated in the Motion (\$6,844.00) as long as it is the form of a lump sum payment.
2. Respondent requests that a reasonable deadline be set to consummate the redemption by payment in full of the amount referenced above.
3. Respondent requests that it be given twenty-one (21) days from the date payment is tendered to cancel its lien of record and surrender the Certificate of Title.
4. Respondent will propose an Agreed Order to counsel for the Debtor and believes the parties can submit same prior to the scheduled hearing on this matter on 11/20/2024 at 1:00 p.m.

WHEREFORE, Respondent prays for entry of an Order with the provisions set forth above and for such other and further relief to which it may be entitle.

Respectfully Submitted

/s/ Don J. Knabeschuh  
5090 Richmond Ave. #472  
Houston, TX 77056-7402  
713 984-4615  
Attorney for Movant

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2024, a true and correct copy of the above and foregoing Response to Motion to Redeem was either served electronically or mailed, by first class regular mail to the the attorney for the Debtor, and to the other interested parties at their addresses of record as scheduled below.

/s/ Don J. Knabeschuh

Alan D Borden  
Resolve Law Group  
801 Travis St Ste 2101  
Houston, TX 77002